

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

THE FIRST SET OF DOCUMENT AND INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. 05-35

Respondent: Nancy G. Culliford

Date: August 23, 2005

Information Request D.T.E. 1-12

- Q. The Precedent Agreement indicates that it is effective as of January 21, 2005. Please indicate the date when Ron Lukas, on behalf of KeySpan, executed the document. Discuss the reason for the delay, if any, in submission to the Department.
- A. KeySpan's bid for volumes on the Tennessee ConneXion Project was submitted on January 21, 2005. After Tennessee confirmed that KeySpan was one of the winning bidders, Mr. Lukas signed the Precedent Agreement on February 22, 2005. Tennessee returned a fully signed Precedent Agreement to KeySpan on a March 3, 2005. Between March 3, 2005 and April 29, 2005, KeySpan documented its analysis, and prepared its petition and supporting testimony for filing at the Department.